

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

KENNETH DAVIDSON AND JANA	*	CIVIL ACTION NO. 4:15-cv-00827
DAVIDSON, INDIVIDUALLY AND ON	*	
BEHAL OF THE THEIR MINOR CHILDREN	*	
JCD AND KSD, AND THOMAS FARMER	*	
	*	JUDGE: SIM LAKE
VERSUS	*	
	*	
ROCKWELL INTERNATIONAL CORPORATION*	*	
ET AL	*	

**COMPLAINANTS SECOND AMENDED COMPLAINT**

1. The Second Amended Complaint of complainants KENNETH DAVIDSON and JANA DAVIDSON, individually and on behalf of their Minor Children JCD and KSD, and THOMAS FARMER, of legal age, respectfully represents that Complainants amend their original Complaint and First Amended And Supplemental Complaint, as follows:

2. By amending Paragraph 3 to read as follows:

“3. The following party is made defendant herein:

A. FAIRCHILD CONTROLS CORPORATION- a foreign corporation, domiciled in Delaware, having its principal business office located at 540 Highland Street Frederick, Maryland, 21701, having appointed as agent for service of process National Registered Agents, Inc., 160 Greentree Drive, Suite 101, Dover Delaware 19904;”

3. By deleting paragraph 4.

4. By amending paragraph 5 to read as follows:

“5. On the 31st day of May, 2011, complainants, Kenneth Davidson, a sensor operator, and Thomas Farmer, pilot, comprised the air crew aboard the Turbo Commander aircraft

bearing FAA registration number N690EH, flying over the State of New York performing an acquisition and evaluation flight. The aircraft is a pressurized, fixed wing multi-engine turbo prop aircraft manufactured by Rockwell International Corporation, powered by a TPE331-5 aircraft engine manufactured by Airesearch Manufacturing Company, containing an Air Cycle Machine manufactured by defendant FAIRCHILD CONTROLS CORPORATION, and which aircraft was owned by Northrop Grumman Corporation And/or Northrop Grumman Systems Corporation.”

5. By deleting paragraphs 8, 9, 10 11,12,13 and 14.
6. By deleting paragraphs 18, 19, 20, 21 and 22.
7. By deleting any other reference to any person or corporation, other than Fairchild Controls Corporation, as a “defendant” in the instant litigation, wherever it may appear throughout the Original and/or First Amended and Supplemental Complaint to reflect their dismissal from the proceedings prior to transfer from the Southern District of New York.

Complainants renew and reiterate all of the allegations of the original and First Amended And Supplemental Complaint as amended herein.

RESPECTFULLY SUBMITTED,

By:       /s/ Michael C. Palmintier      

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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I have this day mailed, via the Courts electronic filing system, a true and correct copy of the above and foregoing pleading to the following:

This, the \_\_\_\_\_ day of \_\_\_\_\_, 2015.

By:           /s/ Michael C. Palmintier            
MICHAEL C. PALMINTIER